

January 9, 2011

Al Garcia
Pretreatment Coordinator
USEPA Region 8
Industrial Pretreatment Program (8P-W-WW)
1595 Wynkoop,
Denver, Colorado 80202-1129

Mr. Garcia,

The City of Rock Springs is submitting multiple items which were to be completed by February 10, 2011 extended submittal date, (original date of January 28, 2011), for February 12, 2011, and February 25, 2011 as required from the recent 2010 Audit and PCI.

We have completed the following items:

3.

Items changed to improve our data evaluation procedures Permit Boiler plate showing how we have changed our monitoring frequency to monthly/quarterly, new running violation list for each IU/SIU, Self Monitoring Report (SMR) Check list with the addition of the most recent SNC calculation date, Tracking Board on wall with the addition of the next SNC calculation due date, File Review log sheets listing dates of last submittals of forms and requirements, including SMR's, and three example copies of our recent Spread sheet program for TRC/SNC calculations, please note that the Memorial Hospital recently has two metals violations, and a past pH violation which we are currently issuing NOV's with possible compliance schedules and or penalties.

6.

- a. We have included our Permit Boiler Plate which now has the SNC criteria included.
- b. The Permit Boiler Plate also shows the changes in the wording to include that a signed and dated SMR be provided as part of the reporting conditions in the Permit.
- c. We have also made the needed changes in our Permit Boiler Plate to require that the IU listed in the Permit provide the required signed Certification Statement as found in 40 CFR 403.6(a)(2)(ii) of the general pretreatment regulations, in the SMR.

8.

- a. The City has removed all the received date and time lines from the top left of our documents and forms. We will be using a date received stamp from now on. A Self Monitoring Report Boiler Plate has this change and is included. Copies of several SMR Check Lists are included.

12.

- a. Copies of the blank and those completed for each Industrial User are attached for your review.
- b. I have included the response from the Memorial Hospital for the required slug and spill plan. Further work on this issue will be needed the document has room for improvement. I will be meeting with the hospital to provide them with copies of the plan requirements and to assist them in complying with this requirement as quickly as possible.
- c. -We have performed our initial writing of the sampling protocol and method books. Several examples are provided for your review, this will continue to evolve as we actually do a sampling event this June 2011.
-The Memorial Hospital Permit was re-issued in December of 2010, to address the some needed corrective actions and to remove some testing parameters which have shown no concerns. Another review of their permit is scheduled for June 2011.
-As for the Sampling Protocol and methods we have written up initial protocol and methods, and have provided a picture of the Memorial Hospital Sampling Protocol and Methods book and the written procedures included in that book, also provided in the picture and in the submittal.
-A copy of a blank and completed Chain of Custody form we will be using is included for your review.

13.

I have attached a completed copy of one of our IU inspection reports which contains the addition of the required signature line.

15.

As stated in 12. (c) above, we have purchased the recommended bound field books for the sampling protocol and methods documentation. We have completed the initial procedures write up in each book, as stated their will be a continued update of this data as we start our sampling events in June 2011. This was due February 25, 2011.

17.

We have already started using the forms that are attached and believe that the SNC calculations will not be missed again. The changes we have made include an SNC Spread sheet to assist us in calculating the TRC and SNC. We will continue to review and update as needed to prevent any re-occurrence of this issue. Copies of the completed Spread Sheets are provided, all IU/SIU files have been done and are up to date, and noted violations are being addressed.

I have included a copy of our new phone and contact log for each IU/SIU, We will be using these for each contact as of this date.

I will also email copies of the pictures I have provided to you as copying them is not very effective

Thank you for your help, and patience in resolving these issues.

If I may be of further assistance, please call me at (307) 352-1466.

Sincerely,

Randy Conner
Projects & Programs Coordinator

cc: Vess Walker, Public Services Director
Vince Crow, City Attorney
Mike Gaviotis, Wastewater Treatment Plant Superintendent
Technical Support Supervisor, Water Quality Division, WYDEQ
Aaron Urdiales, NPDES Enforcement Unit – (8-ENF-W-NP)
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